

ASSENTED-TO MOTION TO ADMIT KEITH W. MILLER PRO HAC VICE

Defendant LBRY, Inc. ("LBRY") respectfully moves to admit Keith W. Miller *pro hac vice*, pursuant to Local Rule 83.2(b). In support of this motion, LBRY states:

- 1. LBRY has a long-standing relationship with Attorney Miller, and it wishes for him to be involved in all stages of these proceedings.
- 2. The attached supporting affidavit, *see* Local Rule 83.2(b)(1), attests that Attorney Miller is a member in good standing of the bar of New York and New Jersey, and several federal district and appellate courts. Attorney Miller is not currently suspended or disbarred in any jurisdiction, and there are no previous or pending disciplinary matters against him. Attorney Miller has no prior felony or misdemeanor criminal convictions. Finally, no court has ever denied an application by Attorney Miller for admission *pro hac vice*, nor has any court ever revoked such status.
- 3. Attorney Miller will at all times be associated with the undersigned, who is a member of the bar of this Court.

- 4. The fee for admission is being paid contemporaneously with the filing of this motion. *See* Local Rule 83.2(b)(2).
- 5. The undersigned has made a good-faith attempt to obtain concurrence in the relief sought by this motion. *See* Local Rule 7.1(c). Counsel for plaintiff assents to the relief sought.
- 6. This motion is supported entirely by the accompanying affidavit of Attorney Miller and the points made above, and therefore does not require a memorandum. *See* Local Rule 7.1(a)(2).

WHEREFORE, LBRY respectfully requests that the Court admit Keith W. Miller *pro hac vice*.

May 11, 2021

Respectfully submitted,

LBRY, Inc.

By its attorneys,

/s/ William E. Christie

William E. Christie (N.H. Bar No. 11255) Shaheen & Gordon, P.A. 107 Storrs Street P.O. Box 2703 Concord, NH 03302 (603) 617-3029 wchristie@shaheengordon.com

## **Certificate of Service**

I do hereby certify that, on this 11th day of May, 2021, I caused true and correct copies of the foregoing Assented-To Motion to Admit Keith W. Miller *Pro Hac Vice* together with its supporting affidavit to be served on counsel of record for all parties that have appeared to date through the Court's CM/ECF system as listed below.

Peter Moores Eric Forni Marc Jonathan Jones Securities and Exchange Commission 33 Arch Street 24th Floor Boston, MA 02110

/s/ William E. Christie

William E. Christie